

Oyster Creek 1Q/2014 Plant Inspection Findings

Initiating Events

Significance:  Mar 31, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

Untimely Performance of a 50.65 a(4) Risk Evaluation during a Maximum Emergency Generation Action

The inspectors identified a Green non-cited violation of 10 CFR Part 50.65(a)(4), "Requirements for monitoring the effectiveness of maintenance at nuclear power plants," when Exelon did not assess and manage risk prior to performing maintenance on the B control rod drive pump after the grid operator declared a maximum emergency generation action on January 30, 2014. Exelon entered this issue into their corrective action program as issue report 1614625.

The inspectors determined that Exelon did not assess and manage risk prior to performing maintenance on the B control rod drive pump after the grid operator declared a maximum emergency generation, which was a performance deficiency that was reasonably within Exelon's ability to foresee and correct. This finding is more than minor because it affected the configuration control attribute of the mitigating systems cornerstone and affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The inspector used NRC inspection manual chapter 0609 appendix K, flowchart 2, "Assessment of Risk Management Actions," to determine the significance of this finding. The inspectors determined that the finding is of very low safety significance (Green) as the finding was associated with risk management actions only and the incremental core damage probability was not greater than 1E-6.

The finding has a cross-cutting aspect in the area of Problem Identification and Resolution, because Exelon did not effectively take corrective actions to address issues in a timely manner commensurate with their safety significance [PI.3]. (Section 1R13)

Inspection Report# : [2014002](#) (*pdf*)

Significance:  Mar 31, 2014

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

Corrective Action to Prevent Recurrence Ineffective to Preclude Repetition of a Significant Condition Adverse to Quality

A self-revealing Green non-cited violation of 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," was identified when the corrective action to prevent recurrence of a significant condition adverse to quality did not preclude repetition of the event. Specifically, Exelon generated a corrective action to prevent recurrence during a root cause evaluation (RCE) for a reactor scram caused by spiking on intermediate range monitor (IRM) nuclear instruments that occurred in May 2004, and a similar event occurred in October 2013, which was determined to be a repeat of the May 2004 event. Exelon is planning to repair the IRM cables in the next refuel outage. Exelon entered this issue into their corrective action program as issue report 1567196.

The inspectors determined that Exelon did not preclude repetition of a significant condition adverse to quality, which

was a performance deficiency that was reasonably within Exelon's ability to foresee and correct. This performance deficiency is more than minor because it is associated with the Initiating Events cornerstone and adversely affected the cornerstone objective to limit the likelihood of events that upset plant stability and challenge critical safety functions during shutdown as well as power operations. The significance of this finding was determined using NRC IMC 0609 appendix A, exhibit 1. This finding screened as very low safety significance (Green), because the finding did not contribute to both the likelihood of a reactor trip and likelihood that mitigation equipment or functions would not be available.

The finding does not have a cross cutting aspect as it is not reflective of current performance.

Inspection Report# : [2014002](#) (*pdf*)

Mitigating Systems

Significance:  Sep 30, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

Physical Change To Security Feature Causes Flood Control Feature To Be Ineffective

The inspectors identified a Green non-cited violation of 10 CFR 50, Appendix B, Criterion III, "Design Control," in that, Exelon did not ensure applicable regulatory requirements and design basis for the emergency diesel generators were correctly translated into instructions. The inspectors determined that Exelon did not ensure that the applicable regulatory requirements and design basis for flood control features were correctly translated into specifications, drawing, procedures and instructions for the installation of a security wall around the emergency diesel generator building which affected the probable maximum precipitation flood protection features of the building was a performance deficiency that was within Exelon's ability to foresee and correct. Exelon entered this issue into the corrective action program for resolution as IR 1546148. The performance deficiency was more than minor because the finding affected the protection against external factors attribute of the mitigating systems cornerstone objective of ensuring the availability, reliability and capability of systems that respond to initiating events to prevent undesirable consequences. The inspectors determined this finding did involve the loss or degradation of equipment or function specifically designed to mitigate a seismic, flooding or severe weather initiating event, did not involve the assumption that the protected equipment or safety function was completely failed or unavailable, and did not involve the total loss of any safety function, identified by Exelon through a PRA, IPEEE or similar analysis that contributes to external event initiated core damage accident sequences. Therefore, the inspectors determined the finding to be of very low safety significance (Green).

This finding has a cross-cutting aspect in the area of Problem Identification and Resolution, because Exelon did not thoroughly evaluate a problem such that the resolution addressed the cause and extent of condition of an issue that potentially impacted nuclear safety [P.1(c)].

Inspection Report# : [2013004](#) (*pdf*)

Significance:  Jun 30, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

Degraded Emergency Diesel Generator Bypass Sight Glass not identified in the Corrective Action Program

Green. The inspectors identified a Green NCV of 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," because Exelon did not promptly identify a condition adverse to quality. Specifically, from December 10, 2012 to

April 4, 2013, Exelon did not identify that the fuel bypass sight glass on the #1 emergency diesel generator (EDG) was partially full. A partially full fuel bypass sight glass indicates that the bypass relief valve is degraded, challenging the operability of the emergency diesel generator because fuel could have bypassed the fuel injectors and therefore prevented the emergency diesel generator from being able to achieve full rated power. Exelon entered this issue into the corrective action program for resolution as issue report (IR) 1497683 and subsequently replaced a degraded relief valve in the bypass sight glass.

This finding is more than minor because it is associated with the design control attribute of the Mitigating Systems cornerstone and affected the cornerstone objective of ensuring the availability, reliability and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the performance deficiency affected the reliability of an emergency diesel generator to perform its safety function during its mission time. This issue was also similar to Example 3j of NRC IMC 0612, Appendix E, "Examples of Minor Issues," because the condition resulted in reasonable doubt of the operability of the #1 emergency diesel generator and additional analysis was necessary to verify operability. The inspectors evaluated the finding using exhibit 2, "Mitigating System Screening Questions" in Appendix A to IMC 0609, "Significance Determination Process." The inspectors determined that this finding was a deficiency affecting the design or qualification of a mitigating SSC, where the SSC maintained its operability or functionality. Therefore, inspectors determined the finding to be of very low safety significance (Green). The finding has a cross-cutting aspect in the area of Problem Identification and Resolution, Corrective Action Program, because Exelon did not identify the issue associated with the degraded emergency diesel generator bypass sight glass in a timely manner on December 10, 2012 through April 4, 2013 when identified by NRC inspectors. [P.1 (a)]. (Section 1R15.1)

Inspection Report# : [2013003](#) (*pdf*)

Significance:  Jun 30, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

Alarm Response Procedures did not implement Technical Specification Requirements

The inspectors identified a Green NCV of technical specification 6.8.1a for improperly implementing technical specifications requirements into alarm response procedures for the 125 VDC (volts – direct current) system. The inspectors determined that the improper implementation of technical specification requirements into alarm response procedures for the 125 VDC system is a performance deficiency that was within Exelon's ability to foresee and correct. Exelon entered this issue into the corrective action program for resolution as IR 1512551.

The inspectors determined this finding was more than minor because the finding affected the procedure quality attribute of the mitigating system cornerstone objective to ensure the reliability and capability of systems that respond to initiating events. The inspectors determined this finding was not a deficiency affecting the design or qualification of a mitigating SSC, did not represent a loss of system or function, did not represent an actual loss of function of at least a single train for greater than its technical specification allowed outage time, did not represent an actual loss of function of two separate safety systems for greater than its technical specification allowed outage time, and did not represent an actual loss of function of one or more non-technical specification trains of equipment designated as high safety-significant in accordance with Exelon's maintenance rule program for greater than 24 hours. Therefore, the inspectors determined the finding to be of very low safety significance (Green).

This finding has a cross-cutting aspect in the area of Human Performance, Resources, because Exelon did not ensure that procedures affecting nuclear safety were accurately maintained. Specifically, technical specifications requirements regarding the battery charger were not accurately reflected in the alarm response procedure. [H.2(c)] (Section 1R15.2)

Inspection Report# : [2013003](#) (pdf)

Barrier Integrity

Emergency Preparedness

Occupational Radiation Safety

Public Radiation Safety

Security

Although the Security Cornerstone is included in the Reactor Oversight Process assessment program, the Commission has decided that specific information related to findings and performance indicators pertaining to the Security Cornerstone will not be publicly available to ensure that security information is not provided to a possible adversary. Other than the fact that a finding or performance indicator is Green or Greater-Than-Green, security related information will not be displayed on the public web page. Therefore, the [cover letters](#) to security inspection reports may be viewed.

Miscellaneous

Significance: N/A Mar 31, 2009

Identified By: NRC

Item Type: AV Apparent Violation

Apparent Violation for Exelon Plants - 1 (2009 Findings)

For apparent violation #1:

Contrary to the above, on March 31, 2009 Exelon Generation Company, LLC (Exelon) provided incomplete and inaccurate information on the status of its decommissioning funding, as required by 10 CFR 50.75 when it submitted the decommissioning funding status report. Specifically, the March 31, 2009, decommissioning funding status (DFS) report contained inaccurate and incomplete information regarding Exelon's compliance with the requirements of 10 CFR 50.75. The report stated that the amount listed for each of the reactors was determined in accordance with 10 CFR 50.75(b) and the applicable formulas of 10 CFR 50.75(c). However, for each of the 23 reactors, the amount reported was a discounted value that was less than the minimum required amount specified by 10 CFR 50.75(b) and (c). The report was material to the NRC because Exelon under-reported its certified decommissioning amounts by approximately \$4 billion, and the NRC staff evaluated the status of Exelon's decommissioning funds based on the inaccurate reports. After identifying the inaccurate information, the NRC required parent company guarantees before

the staff could make its determination that there was reasonable assurance that funds will be available for the decommissioning process.

Inspection Report# : [2012012](#) (*pdf*)

Inspection Report# : [2013201](#) (*pdf*)

Significance: N/A Mar 31, 2009

Identified By: NRC

Item Type: AV Apparent Violation

Apparent Violation for Exelon Plants - 2 (2009 Findings)

For apparent violation #2:

Contrary to the above, on March 31, 2007, and March 31, 2005, Exelon Generation Company, LLC (Exelon) provided incomplete and inaccurate information on the status of its decommissioning funding, as required by 10 CFR 50.75 when it submitted the decommissioning funding status reports. Specifically, the March 31, 2007, and March 31, 2005, decommissioning funding status (DFS) reports contained inaccurate and incomplete information regarding Exelon's compliance with the requirements of 10 CFR 50.75. The reports stated that the amount listed for each of the reactors was determined in accordance with 10 CFR 50.75(b) and the applicable formulas of 10 CFR 50.75(c). However, in multiple instances, the amount reported was a discounted value that was less than the minimum required amount specified by 10 CFR 50.75(b) and (c). The reports were material to the NRC because Exelon under-reported its certified decommissioning amounts, and the NRC staff evaluated the status of Exelon's decommissioning funds based on the inaccurate reports. After identifying the inaccurate information, the NRC required parent company guarantees before the staff could make its determination that there was reasonable assurance that funds will be available for the decommissioning process.

Inspection Report# : [2012012](#) (*pdf*)

Inspection Report# : [2013201](#) (*pdf*)

Last modified : May 30, 2014